

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

ALAMEDA RESEARCH LLC, FTX
TRADING LTD., WEST REALM SHIRES,
INC., AND WEST REALM SHIRES
SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v.

DANIEL FRIEDBERG,

Defendant.

FTX TRADING LTD., MACLAURIN
INVESTMENTS LTD., f/k/a ALAMEDA
VENTURES LTD., and WEST REALM
SHIRES SERVICES, INC.,

Plaintiffs,

- against -

LAYERZERO LABS LTD., ARI LITAN, AND
SKIP & GOOSE LLC,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50419 (JTD)

Adv. Pro. No. 23-50492 (JTD)

¹ The last four digits of FTX Trading Ltd.'s FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

FTX TRADING LTD., ALAMEDA
RESEARCH LLC, ALAMEDA RESEARCH
LTD., NORTH DIMENSION INC., WEST
REALM SHIRES, INC., and WEST REALM
SHIRES SERVICES, INC.,

Adv. Pro. No. 24-50186 (JTD)

Plaintiffs,

-against-

RYAN SALAME,

Defendant.

**AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
DECEMBER 12, 2024 AT 1:00 P.M. (ET), BEFORE THE HONORABLE JOHN T.
DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM NO. 5, WILMINGTON, DELAWARE 19801**

**ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY
PRESENT IN THE COURTROOM. ANY NON-PARTICIPANT MAY OBSERVE
THE HEARING REMOTELY BY REGISTERING IN ADVANCE AT THE LINK BELOW
NO LATER THAN DECEMBER 11, 2024 AT 4:00 P.M. (ET).**

**To attend this hearing remotely, please register using the [eCourt Appearances](#) tool on the
Court's website at www.deb.uscourts.gov.**

ADJOURNED MATTERS:

1. [Notice of Pretrial Conference in an Adversary Proceeding \[*Alameda Research LLC, et al. v. Friedberg*, Adv. No. 23-50419 \(JTD\) – Adv. D.I. 7, filed on July 26, 2023\]](#)

Status: This matter is adjourned to a date to be determined.

2. [Debtors' Objection to Proof of Claim Filed by Ross Rheingans-Yoo \[D.I. 3409, filed on October 30, 2023\]](#)

Status: This matter is adjourned to the February 27, 2025 omnibus hearing.

² Amended items appear in bold.

3. [Motion of Olympus Peak Trade Claims Opportunities Fund I Non-ECI Master LP to Require Debtors' Claims and Noticing Agent to Recognize and Record Transfer of Claim to Olympus Peak Trade Claims Opportunities Fund I Non-ECI Master LP \[D.I. 9289, filed on March 13, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing.

4. [Debtors' Fifty-Sixth \(Substantive\) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim \[D.I. 19176 & 19185, filed on July 1, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing with respect to Blooming Triumph International Limited's objection.

5. [Debtors' Objection to Proof of Claim Filed by SC30, Inc. \[D.I. 19971, filed on July 10, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing.

6. [Debtors' Objection to Proofs of Claim Filed by Cal Bears Sports Properties, LLC \[D.I. 19975, filed on July 10, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing.

7. [Debtors' Objection to Proofs of Claim Filed by North Field Technology Ltd. \[D.I. 20017, filed on July 10, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing.

8. [Debtors' One Hundred Twenty-Third \(Substantive\) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 27179 & 27199, filed on October 23, 2024\]](#)

Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

9. [Debtors' One Hundred Twenty-Fourth \(Substantive\) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 27181 & 27200, filed on October 23, 2024\]](#)

Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

10. [Debtors' One Hundred Twenty-Fifth \(Substantive\) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 27182 & 27201, filed on October 23, 2024\]](#)

Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

11. [Debtors' One Hundred Twenty-Seventh \(Substantive\) Omnibus Objection to Certain No Liability Proofs of Claim \(Customer Claims\) \[D.I. 27190 & 27203, filed on October 23, 2024\]](#)

Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

12. [Debtors' One Hundred Twenty-Eighth \(Substantive\) Omnibus Objection to Certain Duplicate Proofs of Claim \(Customer Claims\) \[D.I. 27191 & 27204, filed on October 23, 2024\]](#)

Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

13. [Motion to Allow Allowance and Payment of Administrative Expense Claim Filed \[D.I. 27739, filed on November 6, 2024\]](#)

Status: This matter is adjourned to the January 23, 2025 omnibus hearing.

RESOLVED MATTERS:

14. [Debtors' One Hundred Twentieth \(Non-Substantive\) Omnibus Objection to Certain Superseded Claims \(Customer Claims\) \[D.I. 27176 & 27196, filed on October 23, 2024\]](#)

Status: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

15. [Debtors' One Hundred Twenty-First \(Non-Substantive\) Omnibus Objection to Certain Superseded Claims \(Customer Claims\) \[D.I. 27177 & 27197, filed on October 23, 2024\]](#)

Status: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

16. [Debtors' One Hundred Twenty-Second \(Substantive\) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 27178 & 27198, filed on October 23, 2024\]](#)

Status: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

17. [Debtors' One Hundred Twenty-Sixth \(Non-Substantive\) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor \[D.I. 27183 & 27202, filed on October 23, 2024\]](#)

Status: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

18. [Debtors' One Hundred Twenty-Ninth \(Non-Substantive\) Omnibus Objection to Certain No Liability Proofs of Claim \(Customer Claims\) \[D.I. 27192 & 27205, filed on October 23, 2024\]](#)

Status: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

19. [Sealing Motion of the Joint Liquidators of Three Arrows Capital, Ltd. \(in Liquidation\) \[D.I. 27899, filed on November 12, 2024\]](#)

Status: On December 2, 2024, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.

20. [Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve \[D.I. 28102, filed on November 20, 2024\]](#)

Response Deadline: December 5, 2024 at 4:00 p.m. (ET)

Responses Received:

- A. [Celsius Litigation Administrator's Limited Objection to the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve \[D.I. 28582, filed on December 5, 2024\]](#)
- B. Informal comments from Three Arrows Capital, Ltd. (In Liquidation)

Related Documents:

- A. [Declaration of Steven P. Coverick in Support of the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve \[D.I. 28103, filed November 20, 2024\]](#)

- B. Debtors' Reply in Support of the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve [D.I. 28642, filed on December 9, 2024]
- C. Certification of Counsel [D.I. 28661, filed on December 10, 2024]
- D. **Order Establishing the Amount of the Disputed Claims Reserve [D.I. 28689, entered on December 11, 2024]**

Status: On December 11, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing on the matter is not required.

MATTER GOING FORWARD:

- 21. [SEALED] Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 27755, filed on November 6, 2024]

Response Deadline: November 26, 2024 at 4:00 p.m. (ET); extended for the Debtors to December 5, 2024

Responses Received:

- A. Debtors' Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim [D.I. 28587, filed on December 5, 2024]
- B. The Official Committee of Unsecured Creditors' Joinder to the Debtors' Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim [D.I. 28603, filed on December 6, 2024]

Related Documents:

- A. Debtors' Objection to Proofs of Claim Filed by the Joint Liquidators of Three Arrows Capital Ltd. [D.I. 19797, filed on July 8, 2024]
- B. Notice of Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 27756, filed on November 6, 2024]
- C. Notice of Filing of Redacted Version of Motion of the Foreign Representatives of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim [D.I. 27901, filed on November 12, 2024]
- D. Amended Notice of Motion of the Foreign Representatives of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 27911, filed on November 13, 2024]

- E. [REDACTED] Declaration of Benjamin S. Beller in Support of Debtors' Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 28660, filed on December 10, 2024]
- F. [SEALED] Declaration of Benjamin S. Beller in Support of Debtors' Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 28588, filed on December 5, 2024]
- G. Declaration of Nicholas Shay in Support of Debtors' Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 28589, filed on December 5, 2024]
- H. Reply in Support of Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim [D.I. 28641, filed on December 9, 2024]
- I. Notice of Debtors' Exhibit List and Intent to Offer Witness Testimony at the Hearing on December 12, 2024 Regarding the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim [D.I. 28657, filed on December 10, 2024]
- J. Sealing Motion of the Debtors [D.I. 28659, filed on December 10, 2024]
- K. The Joint Liquidators of Three Arrows Capital, Ltd's (in Liquidation)'s Witness and Exhibit List for Hearing on December 12, 2024 at 1:00 p.m. (Prevailing Eastern Time) [D.I. 28663, filed on December 10, 2024]

Status: This matter is going forward.

ADVERSARY MATTER GOING FORWARD:

- 22. [SEALED] Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [*FTX Trading Ltd. et al. v. LayerZero Labs Ltd. et al.*, Adv. No. 23-50492 (JTD) Adv. D.I. 57, filed on December 5, 2024]

Response Deadline: December 11, 2024 at 4:00 p.m. (ET)

Responses Received:

- A. **Defendants' Opposition to Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [Adv. D.I. 64, filed on December 11, 2024]**

Related Documents:

- A. [SEALED] Declaration of Christopher J. Dunne in Support of Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [Adv. D.I. 58, filed on December 5, 2024]
- B. **[REDACTED] Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [Adv. D.I. 61, filed on December 10, 2024]**
- C. **[REDACTED] Declaration of Christopher J. Dunne in Support of Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [Adv. D.I. 62, filed on December 10, 2024]**
- D. **Motion of Plaintiffs for Entry of an Order (I) Authorizing Plaintiffs to File Under Seal the Declaration of Christopher J. Dunne in Support of Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions and (II) Granting Related Relief [Adv. D.I. 63, filed on December 10, 2024]**
- E. **Declaration of William D. Dalsen in Support of Defendants' Opposition to Plaintiffs' Motion to Compel Defendant LayerZero Labs Ltd. to Produce Documents and to Make Two of Its Officers and Managing Agents Available for Depositions [Adv. D.I. 65, filed on December 11, 2024]**

Status: This matter is going forward.

STATUS CONFERENCE:

- 23. Debtors' Motion for a Preliminary Injunction and Expedited Discovery [*FTX Trading Ltd. et al v. Ryan Salame*, Adv. No. 24-50186 (JTD) – Adv. D.I. 2, filed on November 4, 2024]

Responses Received:

- A. Defendant's Emergency Motion to Strike Plaintiffs' Certificate of No Objection and for Extension of Time to Respond to Plaintiffs' Motion for Preliminary Injunction and Expedited Discovery [Adv. D.I. 9, filed on December 5, 2024]

Related Documents:

- A. Brief in Support of Debtors' Motion for a Preliminary Injunction and Expedited Discovery [Adv. D.I. 3, filed on November 4, 2024]

- B. Declaration of Stephanie G. Wheeler in support of Debtors' Motion for Preliminary Injunction and Expedited Discovery [Adv. D.I. 4, filed on November 4, 2024]
- C. Debtors' Motion to Exceed Page Limit with respect to Debtors' Brief in Support of Debtors' Motion for a Preliminary Injunction and Expedited Discovery [Adv. D.I. 5, filed on November 4, 2024]
- D. Certificate of No Objection Regarding Debtors' Motion for a Preliminary Injunction and Expedited Discovery [Adv. D.I. 8, filed on December 3, 2024]
- E. Motion to Shorten Notice Regarding Defendant's Emergency Motion to Strike Plaintiffs' Certificate of No Objection and for Extension of Time to Response to Plaintiffs' Motion for Preliminary Injunction and Expedited Discovery [Adv. D.I. 10, filed on December 5, 2024]
- F. Notice of Withdraw Regarding Certificate of No Objection Regarding Debtors' Motion for a Preliminary Injunction and Expedited Discovery [Adv. D.I. 11, filed on December 6, 2024]
- G. Debtors' Certification of Counsel [Adv. D.I. 12, filed on December 6, 2024]
- H. Ryan Salame's Certification of Counsel [Adv. D.I. 13, filed on December 7, 2024]

Status: The parties are at an impasse with respect to scheduling and have submitted competing proposed scheduling orders. This matter is going forward as a status conference.

FEE APPLICATIONS:

24. Interim Fee Applications. See **Exhibit A** attached hereto.

Response Deadline: October 7, 2024 at 4:00 p.m. (ET)

Related Document:

- A. Certification of Counsel [D.I. 28662, filed on December 10, 2024]

Status: A certification of counsel has been filed and submitted in accordance with the Court's procedures. Accordingly, a hearing on this matter is not required unless the Court has any questions.

25. Final Fee Applications. See **Exhibit B** attached hereto.

Response Deadline: December 5, 2024 at 4:00 p.m. (ET)

Related Document:

A. Certification of Counsel [D.I. 28698, filed on December 11, 2024]

Status: A certification of counsel has been filed and submitted in accordance with the Court's procedures. Accordingly, a hearing on this matter is not required unless the Court has any questions.

Dated: December 11, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession